

Exhibit 3

From: James Bopp Jr <jboppjr@aol.com>
Reply-To: James Bopp Jr <jboppjr@aol.com>
Date: Friday, September 2, 2022 at 2:36 PM
To: "vbaranetsky@revealnews.org" <vbaranetsky@revealnews.org>, "bca@akersfirm.com" <bca@akersfirm.com>, "cmilbank@bopplaw.com" <cmilbank@bopplaw.com>, "jgallant@bopplaw.com" <jgallant@bopplaw.com>, "msiebert@bopplaw.com" <msiebert@bopplaw.com>, "rcitak@bopplaw.com" <rcitak@bopplaw.com>
Cc: "dgray@revealnews.org" <dgray@revealnews.org>, "Steffensen, Peter" <psteffensen@mail.smu.edu>
Subject: Re: Unsealing Motion in S.D. TX Case No. #: 4:20-cv-04034

[EXTERNAL SENDER]

We do not consent. Jim

James Bopp, Jr.

Attorney

The Bopp Law Firm, PC | www.bopplaw.com

The National Building | 1 South 6th Street | Terre Haute, IN 47807

voice: (812) 232-2434 ext. 22 | fax: (812) 235-3685 | cell: (812) 243-0825 | jboppjr@aol.com

Sent from [AOL Desktop](#)

In a message dated 9/2/2022 2:10:51 PM US Eastern Standard Time, vbaranetsky@revealnews.org writes:

Dear Counsel,

My name is Victoria Baranetsky. I am General Counsel at The Center for Investigative Reporting, a nonprofit investigative newsroom based in Emeryville California.

I'm emailing you because my client is interested in unsealing documents filed under seal in Eshelman v. True the Vote, Case No. #: 4:20-cv-04034, in which you represent one the Plaintiff. We are planning to file a motion to intervene and unseal pursuant to the presumptive right of access under the common law, and would like to ask if your client would consent to unsealing in this case.

Please let me know by end of day next Tuesday.

Sincerely,
Victoria

--

Victoria D. Baranetsky

General Counsel

(w) 510-982-2890

(c) 201-306-4831

PGP EA48 1FB7 98E3 156E 3AFF 6748 F7B1 8B23 0838 D7F5

From: **Jacobs, Ronald M.** <RMJacobs@venable.com>
Date: Thu, Sep 8, 2022 at 2:43 PM
Subject: RE: Unsealing Motion in S.D. TX Case No. #: 4:20-cv-04034
To: Victoria Baranetsky <vbaranetsky@revealnews.org>
Cc: Dara Gray <dgray@revealnews.org>, Douglas A. Daniels <doug.daniels@dtlawyers.com>, Steffensen, Peter <psteffensen@mail.smu.edu>

Thanks, I conferred with Mr. Eshelman, and he consents to unsealing.

From: Victoria Baranetsky <vbaranetsky@revealnews.org>
Sent: Thursday, September 8, 2022 5:36 PM
To: Jacobs, Ronald M. <RMJacobs@Venable.com>
Cc: Dara Gray <dgray@revealnews.org>; Douglas A. Daniels <doug.daniels@dtlawyers.com>; Steffensen, Peter <psteffensen@mail.smu.edu>
Subject: Re: Unsealing Motion in S.D. TX Case No. #: 4:20-cv-04034

Caution: External Email

Hello Ron,

We are filing by tomorrow. Please let us know at your earliest convenience.

Regards,
Victoria

On Wed, Sep 7, 2022 at 8:26 AM Victoria Baranetsky <vbaranetsky@revealnews.org> wrote:

Thank you for the update.

I'll look out for your email.

Victoria

On Wed, Sep 7, 2022 at 5:38 AM Jacobs, Ronald M. <RMJacobs@venable.com> wrote:

Victoria, thank you for your email. I'm scheduling a time to talk with Mr. Eshelman, but I do not anticipate that he will have any objection to unsealing the documents. I will report back with a final either today or tomorrow. Thank you.

Regards,
Ron

Ronald M. Jacobs | Chair, Political Law Practice | Venable LLP

t 202.344.8215 | f 202.344.8300 | m 202.329.4296

[600 Massachusetts Avenue, NW, Washington, DC 20001](#)

RMJacobs@Venable.com | www.Venable.com | www.PoliticalLawBriefing.com

From: Victoria Baranetsky <vbaranetsky@revealnews.org>

Sent: Friday, September 2, 2022 2:11 PM

To: bca@akersfirm.com; cjclimo@venable.com; Jacobs, Ronald M. <RMJacobs@Venable.com>; sabrina@dtlawyers.com; meghan.mccaig@tklaw.com

Cc: Steffensen, Peter <psteffensen@mail.smu.edu>; Dara Gray <dgray@revealnews.org>

Subject: Unsealing Motion in S.D. TX Case No. #: 4:20-cv-04034

Caution: External Email

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Please let me know by EOD next Tuesday.

Sincerely,
Victoria

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Victoria D. Baranetsky
General Counsel
(w) 510-982-2890
(c) 201-306-4831
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you believe you have received this message in error, please notify the sender by reply
transmission and delete the message without copying or disclosing it.

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null

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